

From: [Jennifer Gaines](#)  
To: [Gaines.jennifer@epa.gov](mailto:Gaines.jennifer@epa.gov)  
Subject: Fw: Mitigation- Rodenticides Questions  
Date: 05/30/2012 01:56 PM

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Jennifer Gaines  
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Insecticide-Rodenticide Branch  
Registration Division (7505P)

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----- Forwarded by Jennifer Gaines/DC/USEPA/US on 05/30/2012 01:52 PM -----

From: Russell Wasem/DC/USEPA/US  
To: "John Lublinkhof" <jlublinkhof@bellabs.com>  
Cc: Jennifer Gaines/DC/USEPA/US@EPA, Jude Andreasen/DC/USEPA/US@EPA, Laura Parsons/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA  
Date: 07/01/2009 05:17 PM  
Subject: Re: Mitigation- Rodenticides Questions

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Good Afternoon John,

To answer your questions.

1. We will treat labeling for the rodenticide bait stations as we do for other similar bait stations (e.g., ant/roach stations). For those we require the following to be on the station: product name, registration number, a.i. statement, signal word with a modified KOROC statement like "Do not allow children or pets to play with the bait station", and a referral statement to the complete labeling. Rodenticide bait stations will also require labeling statement corresponding to which Tier it achieves (taken directly from the RRM). Due to the size of mouse stations complete labels are an option, at a minimum mouse bait stations must contain all of the details mentioned above.
2. if the mitigation language is added by an "amendment" and not by reregistration we will allow old labels to be used through June 2011.

Please let me know if you have any further questions.

Regards,

Rusty\_\_\_\_\_

Rusty Wasem  
Chemical Review Manager  
Special Review & Reregistration Division  
Office of Pesticide Programs

(703)305-6979

▼ Russell Wasem---06/30/2009 03:24:44 PM---Good Afternoon John, I am looking into your questions and should have a response within the next day

From: Russell Wasem/DC/USEPA/US  
To: "John Lublinkhof" <jlublinkhof@belllabs.com>  
Cc: Laura Parsons/DC/USEPA/US@EPA, Jude Andreasen/DC/USEPA/US@EPA  
Date: 06/30/2009 03:24 PM  
Subject: Re: Mitigation- Rodenticides Questions

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Good Afternoon John,

I am looking into your questions and should have a response within the next day.

Regards,

Rusty\_\_\_\_\_

Rusty Wasem  
Chemical Review Manager  
Special Review & Reregistration Division  
Office of Pesticide Programs  
(703)305-6979

▼ "John Lublinkhof" ---06/29/2009 05:35:14 PM---Dear Rusty, Rusty, I have a few additional questions on the rodenticide mitigation.

From: "John Lublinkhof" <jlublinkhof@belllabs.com>  
To: Russell Wasem/DC/USEPA/US@EPA  
Date: 06/29/2009 05:35 PM  
Subject: Mitigation- Rodenticides Questions

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Dear Rusty,

Rusty, I have a few additional questions on the rodenticide mitigation.

1) Regarding refillable bait stations - In the consumer retail market, baits need to be packaged with bait stations. In the case of a refillable bait station, we plan to offer less than one pound of one ounce blocks in a package with a bait station. The bait station would not have bait in it but users would insert the bait into the bait station when necessary. On page 37, there is a listing of mandatory label requirements. It refers to front panel text and use

restrictions.

My understanding is that this wording is to appear on the package label. What isn't clear is what actually needs to appear on the bait station itself? Is it the same wording as for the front panel text? If so, can this wording be embossed into the plastic material that the bait station is made of or does it have to be a sticker? The former is easier from a production standpoint, Also, what font size is needed.

2) Regarding implementation - On page 30 it says that "If a company has a product for which it requested revised labeling on or before Dec. 4, 2009, that on June 4, 2011 the company "must cease production with the old labeling and use up existing stocks of product with old labeling within six months." However, in the June 18, 2008 letter to registrants, it refers to the last day for "Release for Shipment" of Product Not Complying with Risk Mitigation Decision (June 4, 2011) and states that 'this limitation would apply to those products registered both on or after the publication of the Federal Register announcing availability of the decision. In this letter, it does not make any mention of existing products for which amendments are sought. Am I to assume that the page 30 statement holds?

I look forward to receiving clarification on the above points.

Thanks in advance for your help.

Best regards,

John Lublinkhof, Ph.D.  
Director of Regulatory Affairs  
Bell Laboratories, Inc.  
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